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REDACTED - FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 27, 2014

ACCEPTED/FILED  
JUN 27 2014

Federal Communications Commission  
Office of the Secretary

Via Hand Delivery

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of Topsham Telephone Company  
Study Area Code 140068**

Dear Ms. Dortch:

On behalf of Topsham Telephone Company ("Topsham"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Topsham seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 0+3  
List ABCDE

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.202(a).

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124



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Federal Communications Commission  
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Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of Topsham Telephone Company  
Study Area Code 140068  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Topsham Telephone Company ("Topsham") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan") which is contained in the attachment to the 2014 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.
4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services.

<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

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The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

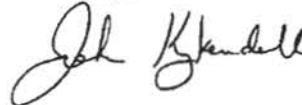
that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall", written in a cursive style.

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

FCC Form 481 - Carrier Annual Reporting  
Data Collection Form

REDACTED FOR PUBLIC INSPECTION

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 140068

<015> Study Area Name TOPSHAM TEL CO

<020> Program Year 2015

<030> Contact Name: Person USAC should contact with questions about this data Mark De Perrior

<035> Contact Telephone Number: 3153245911 ext. Number of the person identified in data line <030>

<039> Contact Email Address: markcpa@cit-tele.com Email of the person identified in data line <030>

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ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
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		(check box when complete)	
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband) (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		
<440>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	140068vt510.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	140068vt610.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)? (if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

## Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>



**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	140068
<015>	Study Area Name	TOPSHAM TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

140068vt112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.


FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

See attached worksheet



(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	140068
<015>	Study Area Name	TOPSHAM TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

[illegible]

(800) Operating Companies  
Data Collection Form  
FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	140068
<015>	Study Area Name	TOPSHAM TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com
<810>	Reporting Carrier	Topsham Telephone Company
<811>	Holding Company	
<812>	Operating Company	

[illegible]

**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	140068
<015>	Study Area Name	TOPSHAM TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)



**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	140068
<015>	Study Area Name	TOPSHAM TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	140068
<015>	Study Area Name	TOPSHAM TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

140068vt1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |  |                                     |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2000) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	140068
<015>	Study Area Name	TOPSHAM TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)} ☐
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)} ☐

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Certification ☐
- <2013> 2014 Frozen Support Certification ☐
- <2014> 2015 Frozen Support Certification ☐
- <2015> 2016 and future Frozen Support Certification ☐

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

- <2016> Certification Support Used to Build Broadband ☐

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification ☐
- <2018> 5th year Broadband Service Certification ☐
- <2019> Interim Progress Certification ☐
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information



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(3000) Rate Of Return Carrier Additional Documentation  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	140068
<015> Study Area Name	TOPSHAM TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035> Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan  
Milestone Certification [47 CFR § 54.313(f)(1)(i)]

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- (3012) Community Anchor Institutions [47 CFR § 54.313(f)(1)(ii)]

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier [47 CFR § 54.313(f)(2)]  
(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ ☒  
(Yes/No) ☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☒  
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, Is your company audited?

(Yes/No) ☐ ☐

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐

- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

- (3023) Underlying information subjected to a review by an independent certified public accountant ☐

- (3024) Underlying information subjected to an officer certification. ☐

- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 DMB Control No. 3060-0986/DMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	140068
<015> Study Area Name	TOPSKAM TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035> Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	140068
<015> Study Area Name	TOPSHAM TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035> Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	TOPSHAM TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/26/2014
Printed name of Authorized Officer:	Mark DePerrior
Title or position of Authorized Officer:	Mark DePerrior
Telephone number of Authorized Officer:	3153245911 ext.
Study Area Code of Reporting Carrier:	140068 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	TOPSHAM TEL CO
Name of Authorized Agent or Employee of Agent:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/26/2014
Printed name of Authorized Agent or Employee of Agent:	Amanda Molina
Title or position of Authorized Agent or Employee of Agent:	Staff Consultant - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	7705692105 ext.
Study Area Code of Reporting Carrier:	140068 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



REDACTED FOR PUBLIC INSPECTION

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**TOPSHAM TELEPHONE COMPANY (SAC 140068)**

**ATTACHMENT - LINE 112**

**FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN**

**ATTACHMENT REDACTED IN ENTIRETY**

**Topsham Telephone Company, Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."<sup>4</sup>

Topsham Telephone Company, Inc. ("Topsham") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. Topsham is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Vermont Public Service Board (PSB) Rules 7.500 and 7.600, which discloses rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers as

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.



identified in Docket 5903, Attachment 2, Consumer Protection Standards, protection against cramming and other deceptive practices as identified in PSB Rule 4.700; (3) truth-in-billing requirements as identified in PSB Rule 4.700; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In addition, Topsham certifies compliance with broadband specific consumer protection obligations under federal law. The federal law obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

**Topsham Telephone Company, Inc.'s Ability to Function in Emergency Situations for voice and broadband.**

Topsham Telephone Company, Inc. hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).<sup>1</sup> The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic.

The company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

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(700) Price Offerings Including Voice Rate Data  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	140068
<015>	Study Area Name	TOPSHAM TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com

**<701> Residential Local Service Charge Effective Date**

1/1/2014

<702> Single State-wide Residential Local Service Charge

&lt;703&gt;

[illegible]



REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481

GMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 140068

<015>	Study Area Name	TOPSHAM TEL CO
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<020>	Program Year	2015
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<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
-------	---	-----------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
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<039> Contact Email Address - Email Address of person identified in data line <030> markcpa@cit-tele.com

[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	140068
<015>	Study Area Name	TOPSHAM TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Mark De Perrior
<035>	Contact Telephone Number - Number of person identified in data line <030>	3153245911 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	markcpa@cit-tele.com
<810>	Reporting Carrier	Topsham Telephone Company
<811>	Holding Company	
<812>	Operating Company	

[illegible]

**Topsham Telephone Company, Inc.****Lifeline Service****FCC Form 481, Line 1200**

The company's website, [www.tops-tele.com](http://www.tops-tele.com), describes their local rates on their "Phone Info and Charges" page. They also have an "About Lifeline" page on their website (see page 2) to notify customers with financial needs about the Vermont Lifeline program, and a more detailed page "Lifeline Guidelines" (see page 3) that describes the program in more detail.

Their "About Lifeline" page also contains a link to the state of Vermont's Public Service Department website's Lifeline section: (see page 4)

[http://dcf.vermont.gov/esd/phone\\_assistance](http://dcf.vermont.gov/esd/phone_assistance)

The company's discounted rates are described below:

**Company Name:** Topsham Telephone Company  
**Calendar Year:** 2012

**Lifeline Services Offered by Telephone Company**

<b>Service Name</b>	<b>Non-Discounted Rate</b>	<b>Total Minutes Provided</b>	<b>Description of Additional Toll Charges (if any)</b>	<b>Lifeline Rate</b>
Local Residential Service	\$14.00	flat rate local	not included	\$7.00

Any bundled service that includes local telephone service is also made available to lifeline customers. The associated price would include the same lifeline discount(s) identified above.



Topsham Telephone Company website, "About Lifeline" page

Topsham Telephone, East Corinth, VT | phone info charges and application - Mozilla Firefox

File Edit View History Bookmarks Tools Help

Topsham Telephone, East Corinth, VT | pho...

www.tops-tele.com/about-info-charges-and-application#l\_\_phone-assistance

YAHOO!

Google

**TOPSHAM TELEPHONE** YOUR FAMILY OWNED PHONE COMPANY

P.O. Box 1075 113 Fairground Rd.  
East Corinth, VT 05040  
PH. 802-439-5325  
Fax 802-439-5600

Home Page  
Directions  
Service Area  
Customer Rights  
Phone Info and Charges  
Telephone Assistance in VT  
Independent Company Charges  
Local Measured Service  
Long Distance  
Pictureline Coming Soon  
Packages  
Digital Television  
Internet  
Payment Options  
Construction Policy  
Telephone Features  
Dig Safe  
Repairs  
Contact Us

**CUSTOMERS WITH SPECIAL FINANCIAL NEEDS ...**

You may qualify for the Life Line Telephone Discount Program through the State of Vermont

This program is based on income eligibility guidelines. You must contact the State of Vermont Life Line Department for program approval. The state will notify your local telephone company of your eligibility.

For an application and other assistance programs please click below.

**VERMONT**  
TELEPHONE ASSISTANCE

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Topsham Telephone Company website, "Lifeline Guidelines"

Topsham Telephone, East Corinth, VT | phone-info-charges-and-application - Mozilla Firefox

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Topsham Telephone, East Corinth, VT | pho...

www.topsham-tele.com/phone-info-charges-and-application#1\_phone-assistance/page-3

YAHOO!

Google

**TOPSHAM TELEPHONE**

P.O. Box 1075 113 Fairground Rd.  
East Corinth, VT 05040  
PH: 802-438-5325  
Fax: 802-438-5800

**YOUR FAMILY OWNED PHONE COMPANY**

Home Page  
Directions  
Service Area  
Customer Rights  
Phone Info and Charges  
Telephone Assistance in VT  
Independent Company Charges  
Local Measured Service  
Long Distance  
Pictures - Coming Soon  
Packages  
Digital Television  
Internet  
Payment Options  
Construction Policy  
Telephone Features  
Dig Sets  
Repairs  
Contact Us

About Lifeline

**ATTENTION VERMONT RESIDENTS**

On June 15, 2013 will you be:  
-65 OR OLDER with income of less than \$26,478? OR  
-UNDER 65 with income less than \$22,695?  
If so, you may apply for a monthly telephone discount(at least \$13.50)  
through the **LIFELINE TELEPHONE DISCOUNT PROGRAM**  
(if your phone company is eligible to participate in the program)

**You must apply before June 15, 2013.**  
Look for the application form in the Vermont Income Tax forms package.  
**Need more information?**  
If you are 65+ call the Senior HelpLine, 1-800-642-5119.  
If you are under 65, call 1-800-287-0589.

**ATTENTION VERMONT RESIDENTS**

Do you receive Medicaid, Food Stamps, Reach Up, or Fuel Assistance through the  
Vermont Department of  
Children and Families (formerly PATH) ?  
If so, you are eligible for at least  
**A \$9.25 monthly telephone discount through the  
LIFE LINE TELEPHONE DISCOUNT PROGRAM**  
(if your phone company is eligible to participate in the program)

Applications and information available by calling  
1-800-287-0589 (Voice/TTY)

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State of Vermont Lifeline webpage:  
http://dcf.vermont.gov/esd/phone\_assistance

Phone Assistance in Vermont | Department for Children and Families - Mozilla Firefox

File Edit View History Bookmarks Tools Help

Topsham Telephone, East Corinth, VT | Phone Assistance in Vermont | Departme... Phone Assistance in Vermont | Departme... x

dcf.vermont.gov/esd/phone\_assistance

YAHOO! Google

**VERMONT**  
Department for Children and Families  
Agency of Human Services

Protecting the family environment, ensuring the safety and well-being of Vermonters

Search this site

**Phone Assistance in Vermont**

The Lifeline Telephone Service is a free telephone service for eligible Vermonters. It provides a lifeline to help with basic needs such as food, shelter, and clothing. **What's new?** Please see our new website for more information.

**Who is eligible?**

- Vermont residents who are on public assistance
- Vermont residents who are on Medicaid
- Vermont residents who are on Supplemental Security Income (SSI)
- Vermont residents who are on Temporary Assistance for Needy Families (TANF)

**How to apply?**

- Call the Lifeline Telephone Service at 1-800-235-8888
- Visit our website at [http://dcf.vermont.gov/esd/phone\\_assistance](http://dcf.vermont.gov/esd/phone_assistance)
- Fill out the application form and submit it to the Lifeline Telephone Service
- Wait for a call from the Lifeline Telephone Service to confirm your eligibility

**Do all Vermonters Complete & Participate in the Lifeline Telephone Service Credit?**

All Vermonters who are eligible for the Lifeline Telephone Service are required to complete the application and participate in the service. This is a condition of receiving the service. If you do not complete the application, you will not be able to receive the service.

**What does the Lifeline Telephone Service Credit entail?**

The Lifeline Telephone Service Credit is a credit that is applied to your telephone bill. It is used to pay for the cost of the Lifeline Telephone Service. The credit is applied to your bill each month.

**Where can I get more information?**

- Call the Lifeline Telephone Service at 1-800-235-8888
- Visit our website at [http://dcf.vermont.gov/esd/phone\\_assistance](http://dcf.vermont.gov/esd/phone_assistance)
- Contact your local community action agency for more information

1-800-235-8888

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**REDACTED – FOR PUBLIC INSPECTION**

**TOPSHAM TELEPHONE COMPANY (SAC 140068)**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**